



Michael J. Willemin

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September 26, 2024

VIA ECF

The Honorable Ronnie Abrams
United States District Judge
Southern District of New York
Thurgood Marshall Courthouse
40 Foley Square, Room 1506
New York, NY 10007

Re: Eckhart v. Fox News Network, LLC, et al.; Case No. 20-cv-5593 (RA)(GWG)

Dear Judge Abrams,

We represent Plaintiff in this action. On September 23, 2024, Defendant Fox News LLC ("Fox News") filed a motion for summary judgment. Pursuant to Your Honor's Individual Rule 5(A)(iii)(a), Plaintiff has a deadline of September 26, 2024 to submit a letter explaining the need to seal or redact certain documents filed in connection with Fox News' motion. Defendant Ed Henry will be filing a motion for summary judgment on September 30, 2024, and we will have until October 3, 2024 to submit a letter explaining the need to seal or redact certain documents filed in connection with Mr. Henry's motion. Accordingly, we respectfully request an extension of the deadline to file the letter related to Fox News' motion, from September 26, 2024 to October 3, 2024, so that we can submit one combined response. Fox News consents to this request.

We thank Your Honor for the Court's time and consideration of this matter.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "M. J. Willemin".
Michael J. Willemin

Application granted. SO ORDERED.

A handwritten signature in blue ink, appearing to read "Ronnie Abrams".

Hon. Ronnie Abrams
U.S. District Court
September 27, 2024